

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

	)	
BETTY ANNE WATERS as	)	
Administratrix of the Estate of	)	
KENNETH WATERS,	)	
Plaintiff,	)	
vs.	)	
	)	
TOWN OF AYER,	)	CIVIL ACTION
NANCY TAYLOR-HARRIS,	)	NO. 04-10521-GAO
ARTHUR BOISSEAU,	)	
BUDDY DECOT,	)	
WILLIAM ADAMSON,	)	
JOHN AND JANE DOES 1-16,	)	
	)	
Defendants.	)	
	)	

**PLAINTIFF’S EMERGENCY MOTION FOR A PROTECTIVE ORDER**

Plaintiff Betty Anne Waters (“Waters”) respectfully submits this Emergency Motion for a Protective Order pursuant to Federal Rules of Civil Procedure 26 (c) in relation to Defendants’ May 9, 2007 Renotice of Deposition of Betty Anne Waters on May 16, 2007. In support of this Motion, Plaintiff submits the accompanying Memorandum of Law.

WHEREFORE, for the reasons set forth in Plaintiff’s Memorandum of Law, this Court should enter an Order prohibiting the defendants from taking a second deposition of Ms. Waters.

Respectfully submitted,

BETTY ANNE WATERS,  
By her attorneys

/s/ Robert N. Feldman

BIRNBAUM & GODKIN, LLP  
Robert N. Feldman (BBO # 630734)  
280 Summer Street  
Boston, MA 02210  
Tel: 617-307-6100  
Fax: 617-307-6101

Barry C. Scheck, Esq.  
Deborah L. Cornwall, Esq.  
Monica Shah, Esq.  
Cochran Neufeld & Scheck, LLP  
99 Hudson St., 8th Floor  
New York, NY 10013  
(212) 965-9081

**L.R. 37 CERTIFICATE**

I hereby certify that the provisions of L.R. 37 have been complied with.

May 14, 2007

/s/ Robert N. Feldman

Robert N. Feldman

**CERTIFICATE OF CONFERENCE PURSUANT TO L.R. 7.1(A)(2)**

Pursuant to L.R. 7.1(A)(2), I certify that the parties have conferred in good faith in an attempt to resolve or narrow the issues presented by this motion but no agreement was reached.

May 14, 2007

/s/ Robert N. Feldman

Robert N. Feldman

**CERTIFICATE OF SERVICE**

I, Robert N. Feldman, hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 14, 2007.

/s/ Robert N. Feldman  
Robert N. Feldman